

Jennifer L. Del Medico (JD-9913)
jdelmedico@jonesday.com
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

Attorney for Defendants
National Public Radio, Inc. (incorrectly
named as “npr (National Public
Radio”), Cable News Network, Inc.
(incorrectly named as “CNN (Cable
News Network)”), and Public
Broadcasting Service (incorrectly
named as “PBS (Public Broadcasting
System) News Hour”)

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

| | | |
|----------------------------------|---|----------------------------------|
| Jack A. Shulman, |) | |
| |) | |
| Plaintiff, |) | 2:17-cv-00764 (JMV) (LDW) |
| |) | |
| v. |) | DEFENDANTS NATIONAL |
| |) | PUBLIC RADIO, INC., CABLE |
| FACEBOOK.com (INC.), |) | NEWS NETWORK, INC., AND |
| npr (National Public Radio), |) | PUBLIC BROADCASTING |
| CNN (Cable News Network), |) | SYSTEM’S NOTICE OF MOTION |
| PBS (Public Broadcasting System) |) | TO DISMISS PLAINTIFF’S |
| News Hour, |) | AMENDED COMPLAINT |
| |) | |
| Defendants. |) | RETURN DATE: MAY 1, 2017 |
| |) | |

To: Paven Malhotra
Grace Yang
KEKER, VAN NEST &
PETERS LLP
633 Battery Street
San Francisco, CA 94111

Dr. Jack A. Shulman
655 Hillcrest Ave.
Westfield, NJ 07090

Plaintiff (pro se)

*Attorneys for Defendant
Facebook, Inc.*

Steven P. Benenson
Rahil Darbar
PORZIO, BROMBERG &
NEWMAN P.C.
100 Southgate Pkwy.,
P.O. Box 1997
Morristown, NJ 07962-1997

*Attorneys for Defendant
Facebook, Inc.*

COUNSEL:

PLEASE TAKE NOTICE that on May 1, 2017 or on a date and time to be set by the Court, Jones Day, attorneys for Defendants National Public Radio, Inc., Cable News Network, Inc., and Public Broadcasting Service (collectively the “Media Entities”), shall move for an order dismissing Plaintiff’s amended complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of that motion, the Media Entities shall rely on their Memorandum of Law in Support of Motion to Dismiss, submitted herewith.

PLEASE TAKE FURTHER NOTICE that the motion is being made returnable on May 1, 2017.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Certification attesting to the date and manner of service is also being submitted herewith.

Dated: March 28, 2017 JONES DAY

By: s/ Jennifer L. Del Medico

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